

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

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Nooksack Post Office, )  
Nooksack, Washington 98276 ) DOCKET NO. A2011-17  
\_\_\_\_\_) )  
\_\_\_\_\_)

MOTION OF PETITIONER, CITY OF NOOKSACK, FOR LEAVE TO  
SUPPLEMENT THE RECORD

COMES NOW the Petitioner, the City of Nooksack and respectfully moves the  
Regulatory Commission for an Order for leave from the June 20, 2011 Order Holding  
Procedural Schedule in Abeyance to file the attached Second Affidavit of Virginia  
Radder.

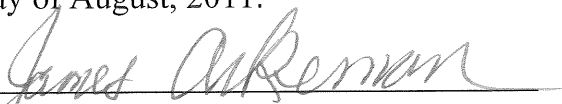
This motion is based on the following grounds:

1. Notwithstanding the Commission's order dated June 20, 2011 holding the  
procedural schedule in abeyance the City of Nooksack desires to file the attached  
Affidavit in order to apprise the Regulatory Commission of recent developments  
regarding the quality of mail service since the May 28, 2011 closure of the Nooksack  
Post Office by the US Postal Service;

2. 39 U.S.C. §3001.21; and

3. The records and files herein.

Respectfully submitted this 5 day of August, 2011.

  
\_\_\_\_\_  
JAMES ACKERMAN, Mayor  
City of Nooksack

MOTION OF PETITIONER

**BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001**

Nooksack Post Office, Nooksack, Washington 98276	) ) ) ) )	DOCKET NO. A2011-17
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**SECOND AFFIDAVIT OF VIRGINIA RADDER**

STATE OF WASHINGTON	)	
	:	ss
COUNTY OF WHATCOM	)	

I, VIRGINIA RADDER being duly sworn on oath deposes and says that:

1. I am over the age of 18 and competent to testify as follows:
2. This statement is being submitted in support of suspending the closure of the Nooksack Post Office (605 Nooksack Avenue, Nooksack, WA 98276) while the appeal of the determination by the US Postal Service is pending before the Postal Regulatory Commission. It is also being submitted in support of the Petition filed by the City of Nooksack seeking review of the Postal Service's determination to close the Nooksack Post Office.
3. I am the City Clerk for the Petitioner, the City of Nooksack.
4. The City of Nooksack both sends and receives mail through the US Postal Service. This includes sending bills to the citizens of Nooksack regarding outstanding utility fees. Frequently the means of payment to the city is the citizen mailing a check or similar

negotiable instrument. Also, in my capacity as City Clerk, I have been contacted by citizens in regard to their concerns and complaints as to the problems with mail delivery since the Nooksack Post Office was closed on May 28, 2011. As such there are a number of problems, I believe the Postal Regulatory Commission should be aware of.

5. Attached as Exhibit "A" is a letter the City received on May 2, 2011. The letter requests the City, as a postal customer, to make an election between renting a post office box at the Everson Post Office or alternatively installing a curbside mail box. The letter was returned on May 6, 2011 with my questions written on the letter. The City elected to install a mail box and maintain a post office box at the Everson Post Office. Attached as Exhibit "B" is a letter dated June 13, 2011 which the City received indicating the Postal Service would be installing cluster boxes throughout the City of Nooksack and that delivery would begin on July 1, 2011. The combination of these two letters is confusing to the extent that the earlier letter asks customers to make an election between a privately installed mail box as opposed to a post office box. Presumptively by indicating that the post office boxes will no longer be free of charge there is an inference that the cluster boxes will be the default means of mail delivery if a prior election was not made, although this was not exactly clear.

6. Attached as Exhibit "C" is a letter the City of Nooksack received on June 21, 2011 which also included the City's keys to its newly installed cluster box. The letter indicates that to utilize the cluster boxes a completed change of address card was required.

7. During the first week the cluster boxes were operational, I observed the rural mail carrier struggling with having the wrong mail for the box. This was because the ZIP code the Postal Service is requiring for a cluster box address is the same ZIP code used by citizens living in Everson. Thus, the Cities of Everson and Nooksack have the same ZIP code 98247. This

creates a problem because the cities of Everson and Nooksack have in many instances the same street names. When I observed the mail carrier with the wrong mail, she was trying to put mail destined for Everson into a Nooksack cluster box. Although I cannot say with certainty, I believe the mail she had had the corresponding street name for citizens living in Everson.

8. Attached as Exhibit "D" is a water bill sent by the City of Nooksack for the billing date June 30, 2011. The intended recipient of the bill had submitted a change of address form as directed by the Postal Service. The address as set forth in the yellow forwarding label affixed to the bill is an Everson street address. My belief as to why the forwarding strip has an Everson address is because the computerized system used to forward the mail treats the 98247 ZIP code as only an Everson ZIP code. Thus a citizen living in Nooksack who has completed a change of address form with the 98247 ZIP code will have their mail redirected to Everson. Attached as Exhibit "E" is a similar letter, this one from the cable television provider Comcast to a citizen of Nooksack. This letter also has the yellow forwarding strip attached and also reveals an Everson as opposed to a Nooksack address. Based on these two examples and what I have discussed with other citizens it is my understanding that every person who completed a change of address form to utilize a cluster box, which is the only current form of free delivery in the City of Nooksack, has had their mail redirected to an Everson address.

9. On July 15, 2011, a citizen who lives at 809 West 1st Street came to City Hall to express concern about not receiving her utility bill from the City. The city's records indicate the bill was placed in the mail on June 30th. However, she did not receive it. This is a citizen who put in a change of address to utilize the recently installed cluster box. West 1st Street is also an address in Everson. My understanding following speaking with this person was she has not received any mail in her cluster box not just the bill sent by the city. This person paid her

outstanding account for her utility bill at City Hall and was advised she should go to the post office, now located in Everson, to discuss this problem with the Postmaster there.

10. Attached as Exhibit "F" is a utility bill the city received as being undeliverable due to an insufficient address. This is a citizen who elected to have her mail delivered to her at the newly installed cluster box. I suspect the problem is that the rural carrier was unable to find this person's address when the letter was delivered to Everson as opposed to Nooksack. I took the returned bill to the Everson post office and asked the officer in charge, Bev Huisman, what she believed the problem was with the mailing address and where has this bill been for the past 18 days as the city placed it in the mail on June 30<sup>th</sup>. Ms. Huisman said she did not know why the bill came back as undeliverable and advised me that the sorting plant in Everett, Washington is sending a lot of mail back. Apparently she has made a call to the district office regarding the problems that are occurring with mail not being delivered to the City of Nooksack.

11. On July 21, 2011, I observed officer in charge, Bev Huisman, removing mail from the cluster box located across the street from City Hall. During the process, I noticed she dropped what appeared to be a piece of mail on the ground. After she left, I picked up what I observed her drop and determined it was a certified letter notice from the Internal Revenue Service mailed to a citizen of Nooksack. I drove the piece of mail to the post office in Everson and returned it to Ms. Huisman and told her she dropped it while she was at the Nooksack cluster box. During this process, I asked her why she was removing mail from some of the cluster boxes. Ms. Huisman indicated that the rural carriers had been placing mail in boxes when the intended recipient has not elected to have cluster box delivery electing instead to pay for a post office box at the Everson Post Office. These are persons who because of their election do not have a key to the cluster boxes. I advised her that in the case of the letter from the Internal Revenue Service it

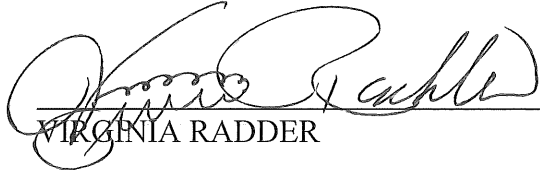
appeared the notice had been in the box since July 15<sup>th</sup> and the intended recipient did not know it was there. Given that the letter was from the Internal Revenue Service it presumptively was of some significance. I believe this will be a problem every time the sender of mail uses a street address to send mail to a person who has elected to maintain a PO box.

12. Recently, I was advised by one of the Nooksack City Councilman that the voters' pamphlets which are customarily mailed from the Whatcom County Auditor's Office were not in the cluster boxes as expected. I checked with the County Auditor's Office and was advised that for whatever reason the voter's pamphlets were not delivered to the cluster boxes and I was advised to try to salvage extra voter's pamphlets from the Everson Post Office recycling bin and distribute them to the citizens of Nooksack.

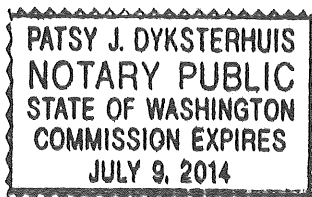
13. Since the installation of the cluster boxes, I have presented some of the city's concerns, particularly the problem with undelivered mail due to the same street addresses in both Nooksack and Everson with the recently hired Postmaster at the Everson Post Office. I was advised by this gentleman that the City of Nooksack should consider changing its street names to avoid some of the problems that the City has been experiencing. This is worrisome to the extent that if the Postal Service's response to these kinds of problems is for the City of Nooksack to change its street names it does not bode well for the reliability of mail delivery to the cluster boxes in the future.

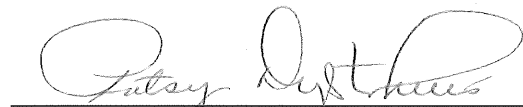
14. Since the Nooksack Post Office closed on May 28, 2011, I have received a great number of concerns and complaints from the citizens of Nooksack regarding the delivery of their mail. What I have described above is typical of the complaints I have heard since the installation of the cluster boxes. Significantly, that the mail is simply not getting delivered promptly and in some cases not at all. This is a significant change since the closure of the Nooksack Post Office.

I believe this is going to be an ongoing problem unless either the post office is reopened or alternatively Nooksack is assigned its own ZIP code such that mail destined for Everson has a different ZIP code than mail destined for the City of Nooksack.

  
\_\_\_\_\_  
VIRGINIA RADDER

SUBSCRIBED and SWORN to before me this 5<sup>th</sup> day of August, 2011.



  
\_\_\_\_\_  
NOTARY PUBLIC in and for the State  
Washington: Residing at Everson  
My Commission Expires: July 9, 2014

Seattle District

EXHIBIT

tabbies

A



Dear Postal Customer:

As you are aware, the Postal Service has been studying operations at the Nooksack Post Office. The Nooksack Post Office will be vacated after May 27, 2011. In order to provide you the service that would best suit your needs, we are asking that you respond to this questionnaire no later than Friday, May 6, 2011.

The type of mail delivery you receive will depend on the decision you make. There are currently a sufficient number of Post Office boxes available for rent at the Everson Main Post Office to accommodate each resident. Should you choose this option, your last line of address will remain Nooksack, WA 98276. For your convenience, a copy of the current schedule of fees has been included. The other alternative is to receive delivery by a postal carrier to a designated curbside mailbox located at or near your home. This option will only require that the last line of your address change to Nooksack, WA 98247. Either way, we are committed to providing uninterrupted to service to all of our customers.

☒ I will be renting a Post Office box at the Everson Main Post Office. *Do we keep our same P.O. Box ??? number*

☒ I will be receiving mail at a curbside box that I will install. *We were told cluster boxes were going up???*

Name: (please print) City of NOOKSACK

Address: P.O. Box 4265 / 103 W. Madison

City: NOOKSACK ZIP Code: 98276

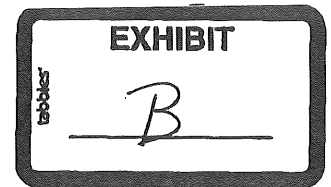
Telephone Number: 360-966-2531 Date: 5/5/11

*The city is opposed to this* RECEIVED  
MAY 02 2011

CITY OF NOOKSACK

*This letter is very vague and not enough detail. Left numerous messages to the Seattle district office. Nobody will call back!!!*





Received

JUN 13 2011

City of Nooksack

First-Class Mail  
Postage & Fees  
Paid  
USPS  
Permit No. G-10

June 13, 2011

Postal Customer:

The Post Office will be installing cluster boxes throughout Nooksack in the coming weeks.

Cluster boxes will be installed along 3<sup>rd</sup> Street that will serve Dennison Lane, Jackson Court, Westview Place, and West 3<sup>rd</sup> Street. Once street delivery is started we will no longer deliver to the rural style boxes located on 3<sup>rd</sup> Street.

Cluster boxes will be installed at the corner of Hayes and West 1<sup>st</sup> Street to serve Hayes Street, 800 and 900 blocks of West 1<sup>st</sup> and 2<sup>nd</sup> Streets.

Cluster boxes will be installed across the street from Nooksack City Hall and will serve West Lincoln Street, West Madison Street, Jackson Street, Garfield Street, 300 to 600 blocks of West 1<sup>st</sup> Street, 500 and 600 blocks of West 2<sup>nd</sup> Street.

Cluster boxes will be installed on East Madison by the Masonic Lodge and will serve East Madison, 600 block of East 1<sup>st</sup> and 2<sup>nd</sup> Streets and East Lincoln.

Cluster boxes will be installed in the 300 block of West 2<sup>nd</sup> to serve the 300 and 400 blocks of West 2<sup>nd</sup> Street.

Cluster boxes will be installed in the parking lot of the Mexican restaurant to serve the 100 and 200 blocks of Nooksack Ave.

We anticipate that keys will be ready to pickup at the Everson Post Office starting June 25th and begin delivery on July 1<sup>st</sup>.

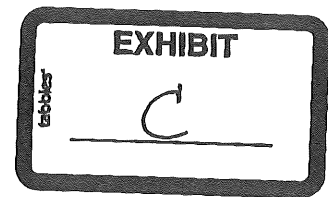
As a reminder the cluster boxes will serve as your form of free delivery. No fee post office boxes will incur rental fees starting July.

Customers on Harrison, West 1<sup>st</sup> Place, 100 and 200 blocks of West 2<sup>nd</sup>, 300 and above on Nooksack Avenue can put rural style boxes on either side of the street where delivery has been established.

Customers on East Grant, East 3<sup>rd</sup> and East 4<sup>th</sup> can install rural style boxes along East 4th Street on the same side of the street as to the boxes that are currently being served for delivery.

Appropriate mail receptacles must be provided for the receipt of mail. Purchase, installation, and maintenance of mail receptacles is the responsibility of the customer.

**632.14 Approach to Mailbox**



Dear Postal Customer:

Enclosed you will find 3 keys to your designated mail slot in the cluster boxes. Due to security reasons the Post Office does not keep any record of the keys handed out. You can make copies of the keys and have them as a spare. It is a \$50 fee to have the locks changed.

The cluster boxes will serve as your form of free delivery. No fee post office boxes will incur charges starting in July.

If you decide to close your post office box and want street delivery, please make sure that you have fill out a Change of Address card with the Post Office or USPS.com. A Change of Address normally takes 4 to 5 days to be processed and have mail go from the old address to the new address in the beginning. Refunds for post office boxes closed early will be prorated and issued at the Everson Post Office.

Your new address is: YOUR NAME  
YOUR STREET ADDRESS  
NOOKSACK WA 98247

All friends, correspondents, and magazine publishers should be notified of your new address, complete with the Zip Code, for their records. First Class Mail, Express Mail & Priority Mail will be forwarded with no additional charge for one year. Periodicals will be forwarded for 90 days. Staudard Mail A will not be forwarded. Standard Mail B will be forwarded with postage due. All forwarding orders expire after one year and cannot be renewed.

You can keep your post office box and also have street delivery. Please come to the Everson Post office to fill out form 4232 and sign up for delivery.

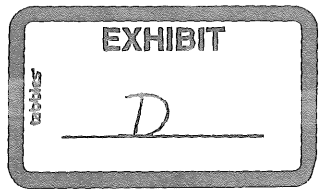
If you have any questions please call me at 360-966-4700.

It is with pleasure that we welcome you and look forward to serving you.

Sincerely,

Beverly Huisman

Received  
JUN 21 2011  
City of Nooksack



JUL 12 2011

CITY OF NOOKSACK

INCORPORATED 1912  
P.O. Box 4265 • 103 W. Madison Street  
Whitman County • Nooksack, WA 99151  
(360) 966-2531 • FAX (360) 966-2503

Service Address 1ST W 603

IF PAST DUE A \$10.00 PENALTY WILL BE ASSESSED.

BILLING DATE 06/30/11 ACCOUNT NUMBER 000780.1

06/30/11 07/25/11 000780.1

1235010 1231420

WATER 35.90  
SEWER 29.25  
SEWER TAX 41.50

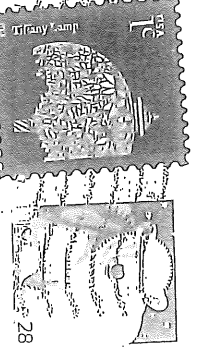
WATER TAX  
SEWER TAX  
Total Due



NOTIFY SENDER OF NEW ADDRESS  
3030 1ST ST  
EVERSON WA 98247-3452  
MC: 882473452 \*0329-0824-30-45

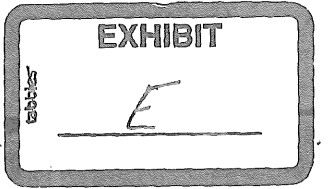
Forwarding  
states City of Everson  
Not Nooksack

BILLING DATE 06/30/11



000780.1

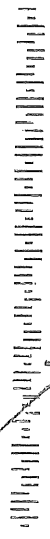
75.00



comcast

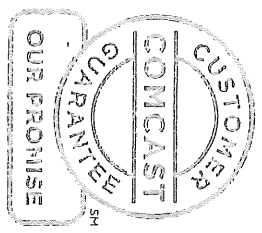
9602 S 300 W, SANDY UT 84070-3340  
8498 3000 NO RP 01 07022011 YNNNNY 01 005089 0016

ROY DENNISON  
PO BOX 4266  
NOOKSACK, WA 98276-0266



JUL 15 2011

9824788288



ELECTRONIC SERVICE REQUESTED

PRESORTED  
FIRST-CLASS MAIL  
U.S. POSTAGE  
PAID  
CSG Mail Services

The Comcast Customer Guarantee  
is our promise to answer your  
questions at your convenience,  
24 hours a day, 7 days a week.

10/14

DENNIS\* 982 DC 1 7110 22 07/10/11  
DENNISON  
302 W LINCOLN ST  
EVERSON WA 98247-0266  
BC: 9824788288 \*9099-02550-10-32

✓

Forwarding Yellow sticker  
says, EVerson, WA

Lincoln st. is in EVerson  
and NOOKSACK

EXHIBIT

F

## CITY OF NOOKSACK

INCORPORATED IN 1912

P.O. Box 4265 • 103 W. Madison Street

Wharcom County • Nooksack, WA 98276  
(360) 966-2531 • Fax (360) 966-2505Service  
Address

2ND W 404

BILLING  
PERIOD

JUNE

Please Return This  
BILLING  
DATE

06/30/11

IF PAST DUE A \$10.00 PENALTY WILL BE ASSESSED.

BILLING DATE	ACCOUNT NUMBER
06/30/11	002850.2
07/25/11	002850.2
830480	824080
WATER	64.00
SEWER	29.25
WATER TAX	
SEWER TAX	
Total Due	

002850.2

75.00

NIXIE

982 4E 1

22 07/10/11

RETURN TO SENDER  
INSUFFICIENT ADDRESS  
UNABLE TO FORWARD

\*0289-02403-30-4.1

JUL 18 2011

CITY OF NOOKSACK

This water/sewer Bill  
WAS Mailed out on June 30, 2011

## CITY OF NOOKSACK

INCORPORATED IN 1912

P.O. Box 4265 • 103 W. Madison Street

Wharcom County • Nooksack, WA 98276

(360) 966-2531 • Fax (360) 966-2505

Service  
Address

2ND W 404

BILLING  
PERIOD

JUNE

Please Return This  
BILLING  
DATE

06/30/11

IF PAST DUE A \$10.00 PENALTY WILL BE ASSESSED.

BILLING DATE	ACCOUNT NUMBER
06/30/11	002850.2
07/25/11	002850.2
830480	824080
WATER	64.00
SEWER	29.25
WATER TAX	
SEWER TAX	
Total Due	

002850.2

75.00

Address under  
Yellow Forwarding  
Sticker →

MORENO, EVELIA  
PO BOX 4135  
NOOKSACK, WA  
98276

IA